



U.S. Department of Justice

United States Attorney  
Southern District of New York

Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

July 14, 2025

**BY CM/ECF**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Keonne Rodriguez and William Lonergan Hill,*  
S3 24 Cr. 82 (DLC)**

Dear Judge Cote:

The Government respectfully writes with the consent of the defendants to request that the Court exclude time under the Speedy Trial Act until the upcoming arraignment on July 22, 2025. (Dkt. 122). As background, Judge Berman previously excluded time through July 16, 2025, which was originally the date of the next Court conference. (Dkt. 77). But after the July 16 conference was adjourned to July 22, 2025, the parties never sought the exclusion of time until that date. (Dkt. 85). Accordingly, the Government respectfully requests that time be excluded until July 22, 2025 pursuant to 18 U.S.C. § 3161(h)(7)(A), and respectfully submits that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial because the time will allow for the defendants to continue to review discovery, prepare for trial, and discuss a potential pre-trial disposition. Counsel to the defendants consents to the exclusion of time.

*Time is excluded per these  
reasons from July 14, 2025  
to July 22, 2025.*

*Denise Cote  
7/14/25*

Respectfully submitted,

NICOLAS ROOS  
Acting Deputy United States Attorney,  
Attorney for the United States,  
Acting Under Authority Conferred by  
28 U.S.C. § 515

By: /s/

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cc: All Counsel of Record